Exhibit D

DIANA MARQUEZ, 01/20/95

PAGE 1 TO PAGE 101

LOONEY & COMPANY

210/734-7127

FOR:

E. PAUL CAULEY, JR.

CONDENSED TRANSCRIPT AND CONCORDANCE PREPARED BY: GENEVA GONZALES, CSR

LOONEY & COMPANY 6800 PARK TEN BLVD., SUITE 216-N SAN ANTONIO, TX 78213 Phone: 210/734-7127 FAX: 210/734-3426



(24) Q. Did you and he ever discuss going through

(25) any type of marriage ceremony or becoming legally

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- (1) married?
- (2) A. Yes.
- (3) Q. Had you decided against it?
- (4) A. I don't understand.
- (5) Q. Okay. Although you discussed becoming
- (6) married, what kept y'all from doing it?
- (7) MR. ALEXANDER: Let me object to
- (8) the question again as to the use of the
- (9) term "marriage," unless you want to specify
- (10) ceremonial marriage.
- (11) Q. (By Mr. Cauley) You can answer.
- (12) MR. ALEXANDER: No, I'll instruct
- (13) her not to answer in that form.
- (14) Q. (By Mr. Cauley) Did you and your husband
- (15) discuss having a legal marriage as you understand
- (16) that term under Mexican law?
- (17) MR. ALEXANDER: I need to take a
- (18) break.
- (19) (WHEREUPON, a brief recess
- (20) was taken.)
- (21) (WHEREUPON, Deposition
- (22) Exhibit Nos. 6 through 11
- (23) were marked for
- (24) identification purposes.)
- (25) Q. (By Mr. Cauley) Okay. Back on the record.

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- (1) Do you know if Mr. Munoz had any other children other
- (2) than Laura Patricia?
- (3) A. No.
- (4) Q. You don't know, or he did not?
- (5) A. No, he doesn't have any.
- (6) Q. Have you ever been ceremonially married to
- (7) anyone?
- (8) A. No.
- (9) Q. Do you know if Mr. Munoz has ever been
- (10) ceremonially married to anyone?
- (11) A. No.
- (12) Q. I apologize for my poor question. He has
- (13) not been married, or you do not know if he has been
- (14) married?
- (15) A. No, he's never been married.
- (16) Q. When did you decide to move to the United
- (17) States following the death of Mr. Munoz?
- (18). A. I beg your pardon? When?
- (19) Q. When did you make the

- decision that you
- (20) would move to the United States?
- (21) A. Well, after he after he died and I saw
- (22) that I didn't have any resources for myself or for my
- (23) daughter.
- (24) Q. Are you working in the United States?
- (25) A. No.

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- (1) Q. How would moving to the United States give
- (2) you resources to support you and your daughter?
- (3) A. Well, for her because she's from here.
- (4) Q. Okay. Have since coming to the
- (5) United States, have you asked for any type of
- (6) assistance or money or anything for your daughter
- (7) from the United States or the State of Texas?
- (8) A. No.
- (9) Q. Before coming to the United States, did you
- (10) know anyone who lived in San Diego, Texas?
- (11) A. No.
- (12) Q. Prior to making your decision to come to
- (13) the United States, did you know anybody in Corpus
- (14) Christi, Texas?
- (15) A. No, I had no. I had relatives who -
- (16) who talked to me about San Diego.
- (17) Q. All right. What relatives talked to you
- (18) about San Diego?
- (19) A. Well, acquaintances.
- (20) Q. Who were the acquaintances?
- (21) A. Friends from over there and in Odessa.
- (22) Q. What were their names?
- (23) A. Well, there were several of them.
- (24) Q. What were their names?
- (25) A. Maricela.

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- (1) Q. Can you remember anyone eise?
- (2) A. And friends of my dad's.
- (3) Q. What were their names?
- (4) A. Well, I don't know their names very well.
- (5) Q. What did Maricela tell you about
- (6) San Diego, Texas?
- (7) A. Well, that it was a small, peaceful town
 - (8) where they speak Spanish.
 - (9) Q. Where did Maricela live?
- (10) A. She lives in Odessa..

- (11) Q. What's her full name?
- (12) A. Maricela Saenz.
- (13) Q. How do you know Maricela Saenz?
- (14) A. She was a friend of my mother-in-law,
- (15) Mario's mom.
- (16) Q. Who is Mario's mother-in-law?
- (17) A. My mother.
- (18) Q. All right. Where does when did how
- (19) long have you known Maricela Saenz?
- (20) A. Around three years.
- (21) Q. Why did you pick San Diego, Texas, over all
- (22) of the other places in the state?
- (23) A. Because of what she had said, that it's a
- (24) peaceful place, and they speak Spanish there.
- (25) Q. Did Ms. Saenz say she knew anybody in

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- (1) San Diego, Texas?
- (2) A. Yes, she said she had family or a friend
- (3) here.
- (4) Q. Okay. Have you talked to that friend?
- (5) A. No.
- (6) Q. Do you know the friend's name?
- (7) A. No.
- (8) Q. Before moving to San Diego, Texas, did
- (9) anybody else tell you anything about San Diego,
- (10) Texas, other than Maricela Saenz?
- (11) A. No.
- (12) Q. And you cannot remember the name of anybody
- (13) else who told you anything about San Diego, Texas?
- (14) A. No.
- (15) Q. When did you enter the United States for
- (16) the purpose of moving to San Diego, Texas?
- (17) A. In September.
- (18) Q. Of 1994?
- (19) A. Yes.
- (20) MR. ALEXANDER: In September or
- (21) August?
- (22) It was in the end of August, first
- (23) part of September.
- (24) Q. (By Mr. Cauley) Before the first
- (25) September of 1994, did anyone other than Maricela

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- (1) Saenz suggest that you move to San Diego, Texas?
- (2) MR. ALEXANDER: Well let me object
- (3) to the question to the extent that it

		8	* \	
BSA	,)	DIANA MARQUET ALIEN		
(8) delivered on the day of	1 (19	DIANA MARQUEZ, 01/20/95 San Antonio, Texas 78213		XMAX
. 1995	1,.5	(210) 734-7127		
(9) to the witness for examination,	(20)			
signature and return	(21)	Job#-5GABA.GENE00		
(10) to Looney & Company by day of . 1995.	(22)			
day of , 1995. (11)	(23)		1	
(12) That the deposition transcript	(24)			
was returned,	(25)		_	
(13) properly executed by the witness	s.			
to the deposition	-		İ	•
(14) officer, and the attached			1	
change/correction sheet	į.			
(15) contains the changes, if any, an the reasons	₫	20		
(16) therefor, made by the witness;	ł	#*************************************	j	
(17)	- 1	*	1	
(18) That the deposition transcript	1	£2	. J	
was not	1			
(19) returned to the deposition officer	.]	*		(¥)
by the witness.	1			
(20)	Į.			
(21) That the original deposition	1		Í	
transcript, or a	J			
(22) copy thereof, together with copie	s		1	
of all exhibits, (23) was delivered on				19
to MR. E. PAUL	-			
(24) CAULEY, Attorney for			}	W
DEFENDANT, GENERAL MOTORS	1			
(25) CORPORATION;	1		1	(*E. 1985
Page 101	-			
(1) That pursuant to the information		**	1	74
made a part of	1		1	(A)
(2) the record at the time said			ł	
testimony was taken, the (3) following includes all parties of	-		ļ	
record:		9		
(4) MR. RAYMOND ALEXANDER,	1	5€)		
Attorney for DEFENDANT,				
DIANA MARQUEZ				
(5)				
MR. E. PAUL CAULEY, Attorney				
for DEFENDANT,	1	4		
(5) GENERAL MOTORS CORPORATION				
(7) MR. JOEL B. LOCKE, Attorney for	1			
DEFENDANT,				
SIVALLS, INC.		•		
(8) That a copy of this cartificate was				
served on	1			
(9) all parties shown herein.	1	i	×	
(10) CERTIFIED TO on this day				€ s
of				
(11) A.D., 1995. (12)	Ì			
(13)	İ	9.•1		
(14)	1	1		
(15)		a		
GENEVA GONZALES	1			
(16) Certified Shorthand Reporter	,			15
in and for the State of Texas	1			
(17) Cert. No.: 5222 Exp. Date:	I			
12/31/95	1	• ***		
(18) LOONEY & COMPANY	1	·		
6800 Park Ten Blvd., Suite 216-N.		*		
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